

U.S. Department of the Interior
Bureau of Land Management
White River Field Office
220 E Market St
Meeker, CO 81641

DETERMINATION OF NEPA ADEQUACY (DNA)

NUMBER: DOI-BLM-CO-N05-2014-0054-DNA

CASEFILE/PROJECT NUMBER: COC60731, COC60732, COC60733

COC 76579 (Bargath's natural gas pipeline to RGU 11-26-198 well pad)
COC76579-01 (Bargath TUP for pipeline to RGU 11-26-198 well pad)
COC76580 (Bargath's natural gas pipeline to RGU 22-26-198 well pad)
COC76580-01 (Bargath TUP for pipeline to RGU 22-26-198 well pad)
COC76581 (Bargath's natural gas pipeline to RGU 33-25-198 well pad)
COC76581-01 (Bargath TUP for pipeline to RGU 33-25-198 well pad)

PROJECT NAME: WPX's proposed RGU 11-26-198, 22-26-198, and 33-25-198 well pads, associated wells, and pipeline and road infrastructure.

LEGAL DESCRIPTION: T. 1 S., R. 98 W., Sec. 26, 6th Principle Meridian
T. 1 S., R. 98 W., Sec. 25, 6th Principle Meridian

APPLICANT: WPX Energy Rocky Mountain, LLC.

ISSUES AND CONCERNS: No issues were identified during the public scoping process.

DESCRIPTION OF PROPOSED ACTION: WPX Energy has requested authorization to construct the RGU 11-26-198, RGU 22-26-198, and RGU 33-25-198 well pads and drill a total of 50 natural gas wells from these locations (Figures 1 and 2). The applicant also requests authorization to install approximately 5,340 feet of gathering lines and 2,800 feet of access road to access the RGU 11-26-198 location, approximately 1,000 feet of gathering lines and 1,000 feet of access road to access the RGU 22-26-198 location, and approximately 3,012 feet of gathering lines and 3,012 feet of access road to access the RGU 33-25-198 location. The operator has confirmed that the access road associated with the RGU 22-26-198 and RGU 33-25-198 will be constructed within the pipeline disturbance corridor. WPX also requests approval to install a 3 inch temporary surface line for completion operations. The line would be approximately 19,047 feet (3.6 miles) in length and would be removed within approximately 10 months from the date of the first completion.

Estimates of surface disturbance within the lease (COC60732 at the surface location) that are most likely attributed to oil and gas activities equal approximately 29 acres. This area represents 2 percent of the total area of the lease, which is approximately 1,205 acres in size.

Estimates of surface disturbance within the lease (COC60735 at the surface location) that are most likely attributed to oil and gas activities equal approximately 54 acres. This area represents 4 percent of the total area of the lease, which is approximately 1,239 acres in size.

If approved and implemented, the Proposed Action would result in approximately 33 acres of surface disturbance (Table 1)

The project area has been influenced by oil and gas activity. Within 2 miles of the proposed disturbance features there are approximately 13 existing well pads in production, ranging in size from 0.9 to 6.6 acres and occupying approximately 54 acres. Producing well pad density equals approximately 3 producing well pads per square mile within the project area while road and pipeline infrastructure density equals approximately 3 miles of road and pipeline corridor per square mile. Moreover, since 2006, approximately 19 NEPA documents have been prepared for actions that are similar in scope and geographic extent to that described in the Proposed Action. For reasons listed above, a DNA was prepared to address perceived and anticipated impacts that may result from implementing the Proposed Action.

For the proposed construction, drilling and completion schedule, see Table 2.

Table 1. Proposed surface disturbance estimates for WPX's proposed RGU 11-26-198, 22-26-198, and 33-25-198 well pads and associated infrastructure.

Well Pad ID	Total Wells	Well Pad Dimensions (ft)	Well Pad Disturbance Footprint (ac)	Pipeline Corridor (ft)	Pipeline Corridor (ac)	Access Corridor (ft)	Access Corridor (acres)	Total Acres Disturbed
RGU 11-26-198	20	350 x 450	6.44	60 x 5340	5.43	24 x 2800	1.93	13.80
RGU 22-26-198	18	350 x 450	6.91	60 x 1000	0.69	24 x 1000	0.69	8.29
RGU 33-25-198	12	350 x 450	6.44	60 x 3012	2.07	24 x 3012	2.07	10.58
Total	50		19.79		8.19		4.69	32.67

Table 2. Proposed construction and drilling schedule for the proposed RGU 11-26-198, 22-26-198, and 33-25-198 well pads and associated infrastructure.

Well Pad ID	Construction Ops. Begin	Rig On	Rig Off	Completion Ops. End
RGU 11-26-198	5/21/15	9/21/15	6/27/16	8/1/16
RGU 22-26-198	8/21/15	7/14/16	3/13/17	5/1/17
RGU 33-25-198	9/25/16	6/25/17	12/10/17	2/25/18

Design Features: See Appendix A.

Decision to be Made: The BLM will decide whether or not to approve the construction of three well pads, and the associated road and pipeline infrastructure. The BLM will also decide whether or not to approve the drilling, operations, and maintenance of the 50 proposed wells on these two locations, and if so, under what conditions.

PLAN CONFORMANCE REVIEW:

The Proposed Action is subject to and has been reviewed for conformance with the following plan (43 CFR 1610.5, BLM 1617.3):

Name of Plan: White River Record of Decision and Approved Resource Management Plan (White River ROD/RMP).

Date Approved: July 1, 1997

Decision Number/Page: Page 2-5

Decision Language: "Make federal oil and gas resources available for leasing and development in a manner that provides reasonable protection for other resource values."

REVIEW OF EXISTING NEPA DOCUMENTS:

Name of Document: White River Resource Area Proposed Resource Management Plan and Final Environmental Impact Statement (PRMP/FEIS).

Date Approved: June 1996

Name of Document: DOI-BLM-CO-110-2013-0084- EA

Date Approved: 10/24/2013

NEPA ADEQUACY CRITERIA:

1. Is the Proposed Action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document? If there are differences, can you explain why they are not substantial?

The anticipated impacts that would result from constructing the proposed well pad locations and the associated road and pipeline infrastructure, in addition to drilling the proposed natural gas wells at these sites, are similar to the anticipated impacts that were addressed and mitigated in the existing NEPA document (DOI-BLM-CO-110-2013-0084-EA). The project area has been heavily influenced by oil and gas activity. Within 2 miles of the proposed disturbance features there are approximately 13 existing well pads in production, ranging in size from 0.9 to 6.6 acres and occupying approximately 54 acres. Producing well pad density equals approximately 3 producing well pads per square mile within the project area while road and pipeline infrastructure density equals approximately 3 miles of road and pipeline corridor per square mile. Moreover, since 2006, approximately 19 NEPA documents have been prepared for actions that are similar in scope and geographic extent to that described in the Proposed Action.

DOI-BLM-CO-110-2013-0084-EA analyzed the potential for impacts to migratory bird nesting, however, due to the proposed timing of construction for that proposal a specific mitigation measure was not applied. However, under this proposal, the timing of construction may coincide with the nesting season for the RGU 11-26-198 and therefore an additional timing mitigation was developed to minimize the potential for impact resulting from initiating development earlier than what was being proposed by the operators proposal. This was considered to be unsubstantial as it only temporarily delays the operators proposed start date by a few days.

All other conditions within the analysis of DOI-BLM-CO-110-2013-0084-EA were similar to the Proposed Action.

2. Is the range of alternatives analyzed in the existing NEPA document appropriate with respect to the new Proposed Action, given current environmental concerns, interests, and resource values?

Two alternatives (Proposed Action and No Action Alternative) were analyzed in DOI-BLM-CO-110-2013-0084-EA. No reasons were identified to analyze additional alternatives and these alternatives are considered to be adequate and valid for the Proposed Action.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new Proposed Action?

Review by BLM White River Field Office (WRFO) specialists in document DOI-BLM-CO-110-2013-0084-EA did not indicate recent endangered species listings and no indication was given to show an updated list of BLM-sensitive species that would be affected by the Proposed Action.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new Proposed Action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

It is assumed that all direct, indirect, and cumulative effects associated with the Proposed Action are similar in scope, intensity, duration and spatial extent as the direct, indirect, and cumulative effects that were addressed in DOI-BLM-CO-110-2013-0084-EA. All anticipated direct, indirect, and cumulative impacts associated with the Proposed Action were reviewed and mitigated in DOI-BLM-CO-110-2013-0084-EA. Anticipated impacts associated with unauthorized use and conversion of the proposed pipeline corridor to a travel corridor has been mitigated.

5. Is the public involvement and interagency review associated with existing NEPA documents adequate for the current Proposed Action?

The public involvement with this project was done by posting it on a list of pending NEPA documents on the BLM WRFO's White River NEPA Register on 2/11/2014. As of 7/29/2014, no comments or inquiries have been received.

INTERDISCIPLINARY REVIEW: The Proposed Action was presented to, and reviewed by, the White River Field Office interdisciplinary team on 2/11/2014. A complete list of resource specialists who participated in this review is available upon request from the White River Field Office. The table below lists resource specialists who provided additional remarks concerning cultural resources and special status species.

Name	Title	Resource	Date
Michael Selle	Archaeologist	Cultural Resources, Native American Religious Concerns	7/24/2014
Ed Hollowed	Wildlife Biologist	Special Status Wildlife Species	3/24/2014
Heather Woodruff	Rangeland Management Specialist/Acting Ecologist	Special Status Plant Species	2/25/2014

REMARKS:

Cultural Resources: 11-26-198 Well pad, access and well tie pipeline: The proposed well pad and linear routes for access has been inventoried at the Class III (100 percent) pedestrian level (Conner *et al* 2014, compliance dated 6/13/2014). The inventory identified three cultural resources, one Isolated finds and two prehistoric open camp sites. The site appears to be more than 330 feet (100 meters) from the proposed well pad location and should not be directly impacted by development. However, due to the improved access into the area as a result of the well pad and access road there is a potential for impacts from unlawful collection and/or excavation due to increased human activity and presence in the area. Any loss of artifacts and contextual information would constitute a long term, permanent, irreversible and irretrievable loss of data from the regional archaeological database.

22-26-198 well pad, access and well tie pipelines: The proposed well pad, access and well tie pipeline area has been inventoried at the Class III (100 percent) pedestrian level (Conner and Davenport 2013) with no cultural resources identified within the 40 acre inventory block or along the access route. There will be no direct impacts to any known sites in the area. However, due to the improved access into the area and increased human activity related to development and improved access there is a high potential for indirect impacts to know cultural resources in the area. Indirect impacts generally include unlawful collection of artifacts and, occasionally, excavation into the site context. Loss of artifacts from tier context and excavations into the site context represent a cumulative, long, term, permanent, irreversible and irretrievable loss of data from the regional archaeological database.

33-25-198 well pad: (Conner 2013 compliance dated 6/14/2013)

Threatened and Endangered Wildlife Species: There are no new wildlife issues beyond those addressed in the original tiering document, including cumulative water depletions as they affect the endangered Colorado River fishes (in this case, an estimated 42 acre-feet will be consumed annually and would be reported to the Colorado BLM State Office), protecting reproductive

efforts of migratory birds, particularly those of higher management concern (in this case, vegetation clearing/construction of the 11-26-198 pad should be initiated outside the primary migratory bird nesting season, 15 May to 15 July, to avoid acute disruption of BLM-sensitive Brewer's sparrow reproductive efforts), and imposing timing limitations on big game severe winter ranges (in this case, consideration for exceptions contingent on conformance with most current Wildlife Mitigation Plan). In a broader sense, prolonging the period of vehicle use along reclaimed cross-country pipeline corridors (in this case, an additional 2 or more years as a surface frac line route) should be minimized to the extent practicable or controlled to avoid the development of a well-established two-track and deter a pattern of unregulated use by the public and an unauthorized route of convenience by the operator.

Special Status Plant Species: An unnamed tongue of the Uintah Formation intersects with the project area (RGU 11-26-198, RGU 22-26-198 and RGU 33-25-198 wellpads) and has been identified as potential threatened SSPS habitat. The project areas were surveyed by WestWater Engineering for SSPS in 2012 and 2013, it was determined that there is no suitable or occupied habitat within 600 meters of the Proposed Action. Therefore, there are no associated issues or concerns for SSPS within the project area.

REFERENCES CITED:

Armstrong, Harley J., and David G. Wolny

1989 Paleontological Resources of Northwest Colorado: A Regional Analysis. Museum of Western Colorado, Grand Junction, Colorado.

Conner, Carle E.

2013 Class III Cultural Resources Survey for the Proposed RGU #33-25-198 Well Location and Related Access in Rio Blanco County, Colorado for WPX Energy Rocky Mountain LLC. Grand River Institute, Grand Junction, Colorado. (13-11-08: SHPO #RB.LM.NR2355)

Conner, Carl E., and Barbara Davenport

2013 Class III Cultural Resource Inventory Report for the Proposed RGU 22-26-198 and RGU 43-23-198 Well Locations and Related Access in Rio Blanco County, Colorado for WPX Energy Rocky Mountain, LLC. Grand River Institute, Grand Junction, Colorado. (13-11-25: RB.LM.R1339)

Conner, Carl E., Barbara Davenport and Hannah Mills

2014 Class III Cultural Resource Inventory Report for the Proposed RGU #11-26-198 Well Location and Related Linear Route in Rio Blanco County, Colorado for WPX Energy Rocky Mountain, LLC Grand River Institute, Grand Junction, Colorado. (14-11-03; OAH # RB.LM.R1371)

Tweto, Ogden

1979 Geologic Map of Colorado. United States Geologic Survey, Department of the Interior, Reston, Virginia.

MITIGATION: The following applicable mitigation from DOI-BLM-CO-110-2013-0084-EA has been carried forward:

Timing Limitations

1. Activities (including construction, drilling, completions etc.) associated with the Proposed Action will not be permitted to take place from December 1 through April 30 to avoid disruption of big game during the severe winter range period. The WRFO will consider excepting/modifying RMP-prescribed timing limitations for those projects (via Sundry Notice) where there is written documentation affirming conformance with the most current Wildlife Mitigation Plan (WMP) or other supplemental agreement, as appropriate.

Pre-Construction Activities and Notifications

2. WPX shall notify NSI of their plans to drill wells on both well pads prior to the commencement of surface disturbing activities to coordinate the mobilization of equipment to the drill site and drilling operations to minimize interference with NSI operations.
3. WPX shall inform NSI during drilling and cementing of the surface casing and during fracing operations.
4. The *designated Natural Resource Specialist* will be notified via email or phone 24 hours prior to beginning all construction-related activities associated with this project that result in disturbance of surface soils. Construction-related activities may include, but are not limited to, pad and road construction, clearing pipeline corridors, trenching, etc. Notification of all construction-related activities, regardless of size, that result in disturbance of surface soils as a result of this project is required.
5. Construction activity should take place entirely within the areas authorized in the ROW grants and temporary use permits.
6. Construction equipment shall be cleaned prior to entering public land at a location and in a manner that does not result in further weed spread.
7. To avoid additional disturbance that may result in erosion of soils around pads, when brush is not sufficient to maintain perimeter brush barrier as shown on Plat 5 E for well pads, waddles or fiber rolls will be used instead of toe trenches for perimeter control. Alternatively a suitable BMP plan may be developed to be approved by BLM that does not require trenches for perimeter control.
8. During pad, road, and pipeline layout, consideration will be given to maintaining old-growth stands in their entirety. Old-growth stands will be those with trees containing individuals of age greater than 300 years and having old-growth stature and development.

Cultural and Paleontological Resource Notifications

9. WPX is responsible for informing all persons who are associated with the project that they will be subject to prosecution for knowingly disturbing archaeological sites or for collecting artifacts.
10. If any archaeological materials are discovered as a result of operations under this authorization, activity in the vicinity of the discovery will cease, and the BLM WRFO Archaeologist will be notified immediately. Work may not resume at that location until approved by the Authorized Officer (AO). WPX will make every effort to protect the site from further impacts including looting, erosion, or other human or natural damage until BLM determines a treatment approach, and the treatment is completed. Unless previously

determined in treatment plans or agreements, BLM will evaluate the cultural resources and, in consultation with the State Historic Preservation Office (SHPO), select the appropriate mitigation option within 48 hours of the discovery. WPX, under guidance of the BLM, will implement the mitigation in a timely manner. The process will be fully documented in reports, site forms, maps, drawings, and photographs. The BLM will forward documentation to the SHPO for review and concurrence.

11. Pursuant to 43 CFR 10.4(g), WPX must notify the AO, by telephone and written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), WPX must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the AO.
12. WPX is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for disturbing or collecting vertebrate fossils, collecting large amounts of petrified wood (over 25lbs./day, up to 250lbs./year), or collecting fossils for commercial purposes on public lands.
13. If any paleontological resources are discovered as a result of operations under this authorization, WPX or any of his agents must stop work immediately at that site, immediately contact the BLM Paleontology Coordinator, and make every effort to protect the site from further impacts, including looting, erosion, or other human or natural damage. Work may not resume at that location until approved by the AO. The BLM or designated paleontologist will evaluate the discovery and take action to protect or remove the resource within 10 working days. Within 10 days, the operator will be allowed to continue construction through the site, or will be given the choice of either (a) following the Paleontology Coordinator's instructions for stabilizing the fossil resource in place and avoiding further disturbance to the fossil resource, or (b) following the Paleontology Coordinator's instructions for mitigating impacts to the fossil resource prior to continuing construction through the project area.

Operations

14. The operator shall prevent use by migratory birds of reserve pits that store or are expected to store fluids which may pose a risk to migratory waterfowl, shorebirds, wading birds and raptors during completion and after completion activities have ceased. Methods may include netting or other alternative methods that effectively prevent use and that meet BLM approval. It will be the responsibility of the operator to notify the BLM of the method that will be used to prevent use two weeks prior to when completion activities are expected to begin. The BLM approved method will be applied within 24 hours after completion.
15. WPX will limit unnecessary emissions from point or nonpoint pollution sources and prevent air quality deterioration from necessary pollution sources in accordance with all applicable state, federal and local air quality law and regulation.

Post-Construction Notifications

16. Once the temporary frac line is removed, the operator will submit a Sundry Notice within 30 days specifying the materials or devices used for barriers where pipelines intersect with well pads or roads (4 locations) in order to prevent the use of these pipelines routes by general public motorized vehicles.

17. At least 90 days prior to termination of the ROW, the holder shall contact the AO to arrange a joint inspection of the ROW. The inspection will result in the development of an acceptable termination and rehabilitation plan submitted by the holder. This plan shall include, but is not limited to, removal of facilities, drainage structures, and surface material (e.g., gravel or concrete), as well as final recontouring, spreading of topsoil, and seeding. The Authorized Officer must approve the plan in writing prior to the holder's commencement of any termination activities.
18. Paint all permanent above ground structures (on-site for six months or longer) Juniper Green according to the BLM Standard Environmental Chart CC-001: June 2008.

Pre & Post-Drilling Notifications

19. Prior to beginning drilling operations, the operator will submit via Sundry Notice a description of the backflow preventer or other method used to protect water quality at diversion sites in the Piceance Creek watershed and that describes the point(s) of diversion for industrial water rights used for freshwater supply from the Piceance Creek watershed.
20. The *designated Natural Resource Specialist* will be notified via email or phone 24 hours prior to well spud (breaking ground for drilling surface casing).
21. The *designated Natural Resource Specialist* will be notified via email or phone 24 hours prior to commencing completion operations.
22. To indicate ownership of aquifer zone impacts that could occur during drilling and completion operations a fluorescent dye other than Rhodamin WT should be added to all drilling fluids used during the surface casing drilling operations.
23. When drilling to set the conductor and surface casing, drilling fluid will be composed only of fresh water, bentonite, and/or a benign lost circulation material that does not pose a risk of harm to human health or the environment (e.g., cedar bark, shredded cane stalks, mineral fiber and hair, mica flakes, ground and sized limestone or marble, wood, nut hulls, corncobs, or cotton hulls).
24. Prior to any construction, a representative will coordinate with the appropriate WRFO Rangeland Management Specialist (Mary Taylor 970-878-3807) to conduct a field inspection of the rangeland improvement project (water line) and address how to maintain the function of the waterline and ensure that it is fully functional prior to scheduled grazing use in June of 2014. The operator will repair any future damage to this water line caused by operational activities of the pit and associated facilities. Any damage caused to the pasture division fence caused by construction must be repaired to BLM specifications in a timely manner (to prevent livestock movement between these two pastures).
25. The operator must coordinate with the livestock grazing permittee (LOV Ranch and Mantle Ranch) authorized to graze livestock within the project area a minimum of 72 hours prior to construction activities associated with this permit. Livestock grazing permittee contact information may be found at www.blm.gov/ras/ or by contacting the WRFO Range staff (970-878-3800). The operator will provide the grazing permittee the location, nature, and extent of the anticipated activity being completed.
26. Any range improvement projects such as fences, water developments, cattleguards, gates, or other livestock handling/distribution facilities that are damaged or destroyed either directly or indirectly as a result of implementation of the Proposed Action shall be promptly (at least prior to the livestock grazing permittee's need to utilize the range improvement) be repaired or replaced by the operator to restore it to at least its pre-disturbance functionality. If the

operator damages any range improvement project(s) the operator will notify the Authorized Officer through sundry notice (Form 3160-5) and identify the actions taken to repair the feature(s).

Resource-Specific Mitigation During Construction, Drilling, and Production:

Access and Transportation

27. All activity shall cease when soils or roads surfaces become saturated to a depth of three inches unless approved by the Authorized Officer.
28. WPX will treat all access roads with water and/or a chemical dust suppressant during construction and drilling activities so that there is not a visible dust trail behind vehicles. Any technique other than the use of freshwater as a dust suppressant on BLM lands will require prior written approval from BLM.
29. To protect surface waters below the project area, keep road inlet and outlet ditches, sediment retention basins, and culverts free of obstructions, particularly before and during spring runoff and summer convective storms. Provide adequate drainage spacing to avoid accumulation of water in ditches or on road surfaces.
30. Install culverts and low-water crossings with adequate armoring of inlet and outlet. Patrol areas susceptible to road or watershed damage during periods of high runoff.
31. Locate drainage dips and drainage ditches in such a manner as to avoid discharge onto unstable terrain such as headwalls or slumps. Provide adequate spacing to avoid accumulation of water in ditches or dips.
32. To reduce erosion adjacent to roads and protect water quality in downstream public lands by maintaining the drainage features of the access roads, access roads will be surfaced with six inches of road base and/or gravel. Maintenance will include restoring the travel surface shape, road surfacing to maintaining an effective all-weather surface during construction, drilling, and production of the wells.

Hazardous or solid wastes

33. Comply with all Federal, State and/or local laws, rules and regulations, including but not limited to onshore orders and notices to lessees, addressing the emission of and/or the handling, use, and release of any substance that poses a risk of harm to human health or the environment. All spills or leakages of oil, gas, produced water, toxic liquids or waste materials, blowouts, fires, shall be reported by the operator in accordance with the regulations and as prescribed in applicable orders or notices.
34. Where required by law or regulation to develop a plan for the prevention of releases or the recovery of a release of any substance that poses a risk of harm to human health or the environment, provide a current copy of said plan to the BLM WRFO.
35. All substances that pose a risk of harm to human health or the environment shall be stored in appropriate containers. Fluids that pose a risk of harm to human health or the environment, including but not limited to produced water, shall be stored in appropriate containers and in secondary containment systems at 110% of the largest vessel's capacity. Secondary fluid containment systems, including but not limited to tank batteries shall be lined with a minimum 24 mil impermeable liner.
36. Construction sites and all facilities shall be maintained in a sanitary condition at all times; waste materials shall be disposed of promptly at an appropriate waste disposal site. "Waste"

means all discarded matter including, but not limited to, human waste, trash, garbage, refuse, oil drums, petroleum products, ashes, and equipment.

37. As a reasonable and prudent lessee/operator in the oil and gas industry, acting in good faith, all lessees/operators and right-of-way holders will report all emissions or releases that may pose a risk of harm to human health or the environment, regardless of a substance's status as exempt or nonexempt and regardless of fault, to the BLM WRFO (970) 878-3800.
38. As a reasonable and prudent lessees/operator and/or right-of-way holder in the oil and gas industry, acting in good faith, all lessees/operators and right-of-way holders will provide for the immediate clean-up and testing of air, water (surface and/or ground) and soils contaminated by the emission or release of any substance that may pose a risk of harm to human health or the environment, regardless of that substance's status as exempt or non-exempt. Where the lessee/operator or right-of-way holder fails, refuses or neglects to provide for the immediate clean-up and testing of air, water (surface and/or ground) and soils contaminated by the emission or release of any quantity of a substance that poses a risk of harm to human health or the environment, the BLM WRFO may take measures to clean-up and test air, water (surface and/or ground) and soils at the lessee/operator's expense. Such action will not relieve the lessee/operator of any liability or responsibility.

Pre-Reclamation Notification

39. The *designated Natural Resource Specialist* will be notified 24 hours prior to beginning all reclamation activities associated with this project via email or by phone. Reclamation activities may include, but are not limited to, seed bed preparation that requires disturbance of surface soils, seeding, or constructing exclosures (e.g., fences) to exclude livestock from reclaimed areas.

Reclamation and Weed Management

40. All seed tags will be submitted to the *designated Natural Resource Specialist* within 14 calendar days from the time the seeding activities have ended via Sundry Notice. The sundry will include the purpose of the seeding activity (i.e., seeding well pad cut and fill slopes, seeding pipeline corridor, etc.). In addition, the SN will include the well or well pad number associated with the seeding activity, if applicable, the name and phone number of the contractor that performed the work, the method used to apply the seed (e.g., broadcast, hydro-seeded, drilled), whether the seeding activity represents interim or final reclamation, an estimate of the total acres seeded, an attached map that clearly identifies all disturbed areas that were seeded, and the date the seed was applied.
41. To reduce erosion and minimize noxious weed establishment, all areas of the disturbance where it is not necessary to keep the area free of vegetation shall be seeded with the Standard Seed Mix 2, as shown in the below table.

Variety	Common Name	Scientific Name	Rate (Lbs. PLS/acre)
Arriba	Western wheatgrass	<i>Pascopyrum smithii</i>	4
Whitmar	Bluebunch wheatgrass	<i>Pseudoroegneria spicata</i>	4
Rimrock	Indian ricegrass	<i>Achnatherum hymenoides</i>	3.5
Lodorn	Green Needlegrass	<i>Nassella viridula</i>	2.5
Timp	Northern Sweetvetch	<i>Hedysarum boreale</i>	3
	Scarlet Globemallow	<i>Sphaeralcea coccinea</i>	0.5

42. The BLM recommends Standard Seed Mix 2 for all reclamation activities. Seeding rates are shown for drill seeding rates in the above table, and should be doubled for broadcast application. Seed should be applied anytime between mid-September and mid-March. If an alternate date of seeding is requested, contact the designated Natural Resource Specialist (NRS) prior to seeding for approval. Seed mixture rates are Pure Live Seed (PLS) pounds per acre. Topsoil stockpiles must be seeded immediately as part of Phase I interim reclamation.
43. All seed used must be certified and free of noxious weeds. All seed tags will be submitted to the designated NRS within 14 calendar days from the time the seeding activities have ended. Documentation shall be provided with the seed tags to address the purpose of the seeding activity (i.e., seeding of re-contoured areas) and, if applicable, the name and contact information of the contractor who performed the work, the seeding method (e.g., broadcast, hydro-seeded, drilled), an as-built shape-file of the area seeded, an attached map that clearly identifies all disturbed areas that were seeded, and the date the seed was applied.
44. If, after three growing seasons, the following success criteria are not achieved then the steps will be reassessed in consultation with the BLM WRFO and additional seeding at an appropriate seeding window will occur. Success criteria to achieve:
 - a) Vegetation monitoring (method approved by the BLM) reveals vegetation with eighty percent similarity of desired foliar cover, bare ground, and shrub and or forb density in relation to the identified DPC. In the absence of specified DPC data, an agreed upon reference site or AIM data would serve as the DPC. Vegetative cover values for woodland or shrubland sites are based on the capability of those sites in an herbaceous state.
 - b) The resulting plant community must have composition of at least five desirable plant species, and no one species may exceed 70 percent relative cover to ensure that site species diversity is achieved. Desirable species include native species from the surrounding site, species listed in the range/ecological site description, or species from the BLM approved seed mix.
45. The operator will implement an integrated weed management plan according to BLM manual 9015-Integrated Weed Management (BLM 1992) and maintain this treatment through

approval of final reclamation of the project. Prior to the season of construction, WPX must submit Pesticide Use Proposals for the use of herbicides appropriate for control/eradication of the known noxious and invasive nonnative species.

46. In accordance with the 1997 White River RMP/ROD, all trees removed in the process of construction shall be purchased from the BLM. Trees should first be used in reclamation efforts and then any excess material made available for firewood or other uses.
- a) First, woody material will be chipped and stockpiled for later use in reclamation. Woods chips can be incorporated into the topsoil layer to add an organic component to the soil to aid in reclamation success.
 - b) Woody materials, not used for woods chips, required for reclamation shall be removed in whole with limbs intact and shall be stockpiled along the margins of the authorized use area separate from the topsoil piles. Once the disturbance has been recontoured and reseeded, stockpiled woody material shall be scattered across the reclaimed area where the material originated. Redistribution of woody debris will not exceed 20-30% ground cover. Limbed material shall be scattered across reclaimed areas in a manner that avoids the development of a mulch layer that suppresses growth or reproduction of desirable vegetation. Woody material will be distributed in such a way to avoid large concentrations of heavy fuels and to effectively deter vehicle use.
 - a. Woody materials that are to be stockpiled along margins and not used in the topsoil should not exceed pile dimensions of 8 x 8 x 8 feet. Materials used in the stockpiles should be a variety of diameters, but should be no smaller than 6 inches in diameter. Additionally the piles should be no less than 30 feet apart.

Trees that must be removed for construction and are not required for reclamation shall be cut down to a stump height of 6 inches or less prior to other heavy equipment operation. These trees shall be cut in four foot lengths (down to 4 inches diameter) and placed in manageable stacks immediately adjacent to a public road to facilitate removal for company use or removal by the public.

47. Final reclamation for abandonment of the site will use the seed mix and reclamation practices recommended by BLM at that time.

Information Sharing & Reclamation Monitoring

48. In an attempt to track interim and final reclamation of federal actions related to the development of federal mineral resources, the operator shall provide the *designated Natural Resource Specialist* with geospatial 'as-built' data in a format compatible with the WRFO's ESRI ArcGIS Geographic Information System (GIS) (e.g., GIS point and polygon features). These data shall be submitted via Sundry Notice (SN) and will be used to accurately locate and identify all geographic as-built (i.e., constructed and design implemented) features (including well pad total disturbance, rights-of-ways, access roads, pipelines, or any other disturbance feature associated with this project).
- These data shall be submitted within 60 days of construction completion. If the operator is unable to submit the required information within the specified time period, the operator shall notify the designated Natural Resource Specialist via email or by phone, and provide justification supporting an extension of the required data submission time period.

- GIS polygon features may include, but are not limited to: full well pad footprints (including all stormwater and design features), constructed access roads/widths, existing roads that were upgraded/widths, and pipeline corridors.
- Acceptable data formats are: (1) corrected global positioning system (GPS) files with sub-meter accuracy or better; (2) ESRI shapefiles or geodatabases; or (3) AutoCAD .dwg or .dxf files. If possible, both (2) and (3) should be submitted for each as-built feature. Geospatial data must be submitted in UTM Zone 13N, NAD 83, in units of meters. Data may be submitted as: (1) an email attachment or (2) on a standard compact disk (CD) in compressed (WinZip only) or uncompressed format. All data shall include metadata, for each submitted layer, that conforms to the *Content Standards for Digital Geospatial Metadata* from the Federal Geographic Data Committee standards. Questions shall be directed to WRFO BLM GIS staff at (970) 878-3800. If the operator is unable to send the data electronically, the operator shall submit the data on compact disk(s) to:

BLM, White River Field Office
Attn: Natural Resource Specialist
220 East Market Street
Meeker, Colorado 81641

Internal and external review of the reporting process and the adequacy of the associated information to meet established goals will be conducted on an on-going basis. New information or changes in the reporting process will be incorporated into the request, as appropriate. Subsequent permit application processing may be dependent upon successful execution of this request, as stated above.

If for any reason the location or orientation of the geographic feature associated with the **Proposed Action changes**, the operator shall submit updated GIS "As-Built" data to designated Natural Resource Specialist within 7 calendar days of the change. This information shall be **submitted via Sundry Notice**.

49. The operator will be required to meet with the WRFO reclamation staff in March or April of each calendar year and present a comprehensive work plan. The purpose of the plan is to provide information pertaining to reclamation activities that are expected to occur during the current growing season. Operators shall also provide a map that shows all reclamation sites where some form of reclamation activity is expected to occur during the current growing season.
50. A Reclamation Status Report will be submitted electronically via email and as a hard-copy to WRFO Reclamation Coordinator, Brett Smithers (brett_smithers@blm.gov). Please submit the hardcopy to:

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The Reclamation Status Report will be submitted annually for all actions that require disturbance of surface soils on BLM-administered lands as a result of the Proposed Action until it is determined that reclamation of the site has met all required objectives of that particular reclamation phase.

the Paleontology Coordinator's instructions for mitigating impacts to the fossil resource prior to continuing construction through the project area.

56. For the RGU 11-26-198 well pad all disturbance must be kept to the east of a line of 108° 22' 12.5" west to avoid direct impacts to cultural resources.
57. Vegetation clearing associated with pad, pipeline, and access construction should be initiated outside the primary migratory bird nesting season, 15 May to 15 July, to avoid acute disruption of migratory bird reproductive efforts. Based on estimated project schedules, vegetation clearing associated with the 11-26-198 pad should be initiated prior to 15 May 2015.
58. Vehicle use of the reclaimed cross-country pipeline corridor (i.e., T1S R98W section 23 SESE and section 24 SWSW) should be minimized to the extent practicable or control initiated to avoid the development of a well-established two-track and as a means to deter a pattern of unregulated use by the public and an unauthorized route of convenience by the operator.

COMPLIANCE PLAN: On-going compliance inspections and monitoring will be conducted by the BLM White River Field Office staff during and after construction. Specific mitigation developed in this document will be followed. The operator will be notified of compliance related issues in writing, and depending on the nature of the issue(s), will be provided 30 days to resolve such issues.

NAME OF PREPARER: Brett Smithers

NAME OF ENVIRONMENTAL COORDINATOR: James Roberts

CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to applicable land use plan and that the NEPA documentation fully covers the Proposed Action and constitutes BLM's compliance with the requirements of the NEPA.

SIGNATURE OF AUTHORIZED OFFICIAL:



Field Manager

DATE SIGNED:

08/26/14

ATTACHMENTS:

Appendix A: Proposed Surface Use Plan of Operations (SUPO) for WPX's proposed RGU 11-26-198, 22-26-198, and 33-25-198 well pads, associated wells, and pipeline and road infrastructure

Figure 1. Project area map that illustrates the geographic location of the proposed well pad locations, associated road and pipeline infrastructure and existing topography.

Figure 2. Project area map that illustrates the geographic location of the proposed well pad locations, associated road and pipeline infrastructure and existing disturbance features.

51. Actions may include, but are not limited to, well pad and road construction, construction of ancillary facilities, or power line and pipeline construction. The Reclamation Status Report will be submitted by September 30th of each calendar year, and will include the well number, API number, UTM coordinates (using the NAD83 datum, Zone 13N coordinate system), project description (e.g., well pad, pipeline, etc.), the COC number, legal description, , project description, date seeded, photos of the reclaimed site taken from permanent photo points, estimate of acres seeded, seeding method (e.g., broadcast, drilled, hydro-seeded, etc.), a diagram showing where reclamation has occurred with photo points identified and noted, reclamation status (e.g., Phase I Interim, Phase II Interim, or Final), whether the well pad or pipeline has been re-vegetated and/or re-contoured, percent of the disturbed area that has been reclaimed, method used to estimate percent area reclaimed (e.g., qualitative or quantitative), technique used to estimate percent area reclaimed (e.g., ocular, line-intercept, etc.), date seeded, photos of the reclaimed site, estimate of acres seeded, seeding method (e.g., broadcast, drilled, hydro-seeded, etc.), additional notes as needed, and contact information for the person responsible for developing the report.
52. The report will be accompanied with maps and GIS data showing each discrete point o (i.e., well pad), polygon (i.e., area where seed was applied for Phase I and/or Phase II interim reclamation or area reclaimed for final reclamation), or polyline (i.e., pipeline) feature that was included in the report. Geospatial data shall be submitted: for each completed activity electronically to the designated BLM staff person responsible for the initial request and in accordance with WRFO geospatial data submittal standards (available from WRFO GIS Staff, or on the WRFO website). Internal and external review of the WRFO Reclamation Status Report, and the process used to acquire the necessary information will be conducted annually, and new information or changes in the reporting process will be incorporated into the report.
53. Every third year, a vegetation monitoring report should accompany the status report. The reclamation status report will be submitted electronically via the most current data management system. Contact your WRFO project lead (NRS/Realty Specialist) with any questions. Any changes to the project status or related information can also be provided through the most current data management system.

The following site-specific mitigation has been developed for construction, drilling and maintenance actions associated with the proposed disturbance features.

54. The operator is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for disturbing or collecting vertebrate or other scientifically-important fossils, collecting large amounts of petrified wood (over 25lbs./day, up to 250lbs./year), or collecting fossils for commercial purposes on public lands.
55. If any paleontological resources are discovered as a result of operations under this authorization, the operator or any of his agents must stop work immediately at that site, immediately contact the BLM Paleontology Coordinator, and make every effort to protect the site from further impacts, including looting, erosion, or other human or natural damage. Work may not resume at that location until approved by the AO. The BLM or designated paleontologist will evaluate the discovery and take action to protect or remove the resource within 10 working days. Within 10 days, the operator will be allowed to continue construction through the site, or will be given the choice of either (a) following the Paleontology Coordinator's instructions for stabilizing the fossil resource in place and avoiding further disturbance to the fossil resource, or (b) following

Note: The signed Conclusion in this DNA Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

Appendix A

Proposed Surface Use Plan of Operations (SUPO) for WPX's proposed RGU 11-26-198, 22-26-198, and 33-25-198 well pads, associated wells, and pipeline and road infrastructure



WPX Energy
1058 County Road 215
P.O. Box 370
Parachute, Colorado 81635
(970) 285-9377

SURFACE USE PLAN OF OPERATIONS (SUPO) 1/24/14

RGU 11-26-198 Pad				
RGU 414-26-198	RGU 514-23-198	RGU 621-26-198	RGU 444-22-198	RGU 641-27-198
RGU 41-27-198	RGU 341-27-198	RGU 441-27-198	RGU 541-27-198	RGU 42-27-198
RGU 342-27-198	RGU 442-27-198	RGU 11-26-198	RGU 311-26-198	RGU 411-26-198
RGU 511-26-198	RGU 12-26-198	RGU 21-26-198	RGU 321-26-198	RGU 421-26-198

Green highlighted cells indicate wells that are being submitted
Proposed rig on date 9/21/15 - proposed rig off date 6/27/16 - proposed construction date 5/21/15
Proposed completions complete date 8/1/16 - proposed interim reclamation start date 2/1/17

RGU 22-26-198 Pad				
RGU 312-26-198	RGU 412-26-198 well	RGU 512-26-198	RGU 13-26-198	RGU 313-26-198
RGU 413-26-198	RGU 513-26-198 well	RGU 14-26-198	RGU 521-26-198	RGU 22-26-198
RGU 322-26-198	RGU 422-26-198	RGU 522-26-198	RGU 23-26-198	RGU 323-26-198
RGU 423-26-198	RGU 523-26-198	RGU 24-26-198		

Proposed rig on date 7/4/16 - proposed rig off date 3/13/17 - proposed construction date 8/21/15
Proposed completions complete date 5/1/17 - proposed interim reclamation start date 10/1/17

RGU 33-25-198 Pad			
RGU 333-25-198	RGU 433-25-198	RGU 34-25-198	RGU 434-25-198
RGU 534-25-198	RGU 343-25-198	RGU 443-25-198	RGU 543-25-198
RGU 44-25-198	RGU 344-25-198	RGU 444-25-198	RGU 544-25-198

Green highlighted cells indicate wells that are being submitted
Proposed rig on date 6/25/17 - proposed rig off date 12/10/17 - proposed construction date 9/25/16
Proposed completions complete date 2/25/18 - proposed interim reclamation start date 8/25/18

Included with this SUPO: Individual planning maps showing complete plans for each surface pad.
cc: WPX Energy Project File

Introduction

The SUPO identifies operations for the RGU 11-26-198, RGU 22-26-198 and RGU 33-25-198 well pads within the Ryan Gulch Unit area. Included are site specific construction and operations information and a POD (Plan of Development) map for each location.

Proposed Action

WPX Energy is proposing to drill 20 new wells on the RGU 11-26-198, 18 new wells on the RGU 22-26-198 and 12 new wells on the RGU 33-25-198 all new locations located on federal surface. There are no future wells planned on any of the three pads. This SUPO will serve as the SUPO for all wells to the above mentioned pads.

Surface Use Plan of Operations

1. Existing Roads

- A. **Legible Maps that show the well site & access routes** – Please see the attached POD maps showing all existing roads for the pads within this SUPO
- B. **Plan for improvement and/or maintenance of existing roads** – Access roads and surface disturbing activities will conform to standards outlined in the 2008 version of BLM and USFS "Surface Operating Standards for Oil and Gas Exploration and Development – The Gold Book."

All non-county roads used to access the wells will be maintained in their current condition or better than before operations began. WPX Energy works in cooperation with the county and other operators regarding any maintenance along county roads with due diligence on dust control and any other maintenance required to access drilling pads. Water application may be implemented if necessary to minimize the amount of fugitive dust.

The Operator will be responsible for continuous inspection and maintenance of the access roads. The Operator will conform to a schedule of preventive maintenance, which at a minimum, provides for the following corrective measures on a biannual basis. (Problem areas will be corrected as needed.)

1. Road surface grading.
2. Relief ditch, culvert cleaning and cattle guard cleaning.
3. Erosion control measures for cut and fill slopes and all other disturbed areas.
4. Road closures in periods of excessive soil moisture to prevent rutting caused by vehicular traffic.
5. Road and slope stabilization measures as required. The road shall be maintained to the standards required for the construction of the road until final abandonment and rehabilitation takes place.

2. New or Reconstructed Access Roads

- A. **Proposed Access Route shown on a Map:** New roads are proposed to each pad site. See attached individual POD planning maps.
- B. **Legible Map that identifies all permanent & temporary access roads proposed to be constructed:** See attached individual POD planning maps.
- C. **All existing and proposed road structures (culverts, bridges, low-water crossings, etc.) shown on a Map and/or Well Plat:** See attached individual POD planning maps.

PAD NAME	ACCESS ROUTE
RGU 11-26-198	New route off County Rd 31 past American Soda plant. Proposed culverts are shown on the attached POD Map.
RGU 22-26-198	New route off County Rd 31 past American Soda plant. Proposed culverts are shown on the attached POD Map.
RGU 33-25-198	New route off County Rd 83. Proposed culverts are shown on the attached POD Map.

- D. **Road (re)construction methods would include:**

Road information:

- The recommended 90 degree safety & visibility with 100 ft width at intersection has been followed.
- Road Length – See below table.
- Road Width (construction row) - See below table.
- Road width (travel width) – See below table.
- Maximum grade – See below table.
- Crown design, or In-slope/Out-slop design (Diagram and/or Narrative) - State and County 2% crown design will be met.
- Drainage and ditch design (Stormwater Mgmt BMP's, On-site and off-site Erosion Control) - Drainage and ditch designs are modeled at 2ft wide by 6 in deep. Refer to site specific Plat 5E stormwater management BMP map's attached. Onsite and offsite erosion control, re-vegetation of disturbed areas

Hazardous or solid wastes

33. Comply with all Federal, State and/or local laws, rules and regulations, including but not limited to onshore orders and notices to lessees, addressing the emission of and/or the handling, use, and release of any substance that poses a risk of harm to human health or the environment. All spills or leakages of oil, gas, produced water, toxic liquids or waste materials, blowouts, fires, shall be reported by the operator in accordance with the regulations and as prescribed in applicable orders or notices.
34. Where required by law or regulation to develop a plan for the prevention of releases or the recovery of a release of any substance that poses a risk of harm to human health or the environment, provide a current copy of said plan to the BLM WRFO.
35. All substances that pose a risk of harm to human health or the environment shall be stored in appropriate containers. Fluids that pose a risk of harm to human health or the environment, including but not limited to produced water, shall be stored in appropriate containers and in secondary containment systems at 110% of the largest vessel's capacity. Secondary fluid containment systems, including but not limited to tank batteries shall be lined with a minimum 24 mil impermeable liner.
36. Construction sites and all facilities shall be maintained in a sanitary condition at all times; waste materials shall be disposed of promptly at an appropriate waste disposal site. "Waste" means all discarded matter including, but not limited to, human waste, trash, garbage, refuse, oil drums, petroleum products, ashes, and equipment.
37. As a reasonable and prudent lessee/operator in the oil and gas industry, acting in good faith, all lessees/operators and right-of-way holders will report all emissions or releases that may pose a risk of harm to human health or the environment, regardless of a substance's status as exempt or nonexempt and regardless of fault, to the BLM WRFO (970) 878-3800.
38. As a reasonable and prudent lessees/operator and/or right-of-way holder in the oil and gas industry, acting in good faith, all lessees/operators and right-of-way holders will provide for the immediate clean-up and testing of air, water (surface and/or ground) and soils contaminated by the emission or release of any substance that may pose a risk of harm to human health or the environment, regardless of that substance's status as exempt or non-exempt. Where the lessee/operator or right-of-way holder fails, refuses or neglects to provide for the immediate clean-up and testing of air, water (surface and/or ground) and soils contaminated by the emission or release of any quantity of a substance that poses a risk of harm to human health or the environment, the BLM WRFO may take measures to clean-up and test air, water (surface and/or ground) and soils at the lessee/operator's expense. Such action will not relieve the lessee/operator of any liability or responsibility.

Pre-Reclamation Notification

39. The *designated Natural Resource Specialist* will be notified 24 hours prior to beginning all reclamation activities associated with this project via email or by phone. Reclamation activities may include, but are not limited to, seed bed preparation that requires disturbance of surface soils, seeding, or constructing exclosures (e.g., fences) to exclude livestock from reclaimed areas.

Reclamation and Weed Management

40. All seed tags will be submitted to the *designated Natural Resource Specialist* within 14 calendar days from the time the seeding activities have ended via Sundry Notice. The sundry

will include the purpose of the seeding activity (i.e., seeding well pad cut and fill slopes, seeding pipeline corridor, etc.). In addition, the SN will include the well or well pad number associated with the seeding activity, if applicable, the name and phone number of the contractor that performed the work, the method used to apply the seed (e.g., broadcast, hydro-seeded, drilled), whether the seeding activity represents interim or final reclamation, an estimate of the total acres seeded, an attached map that clearly identifies all disturbed areas that were seeded, and the date the seed was applied.

41. To reduce erosion and minimize noxious weed establishment, all areas of the disturbance where it is not necessary to keep the area free of vegetation shall be seeded with the Standard Seed Mix 2, as shown in the below table.

Variety	Common Name	Scientific Name	Rate (Lbs. PLS/acre)
Arriba	Western wheatgrass	<i>Pascopyrum smithii</i>	4
Whitmar	Bluebunch wheatgrass	<i>Pseudoroegneria spicata</i>	4
Rimrock	Indian ricegrass	<i>Achnatherum hymenoides</i>	3.5
Lodorn	Green Needlegrass	<i>Nassella viridula</i>	2.5
Timp	Northern Sweetvetch	<i>Hedysarum boreale</i>	3
	Scarlet Globemallow	<i>Sphaeralcea coccinea</i>	0.5

42. The BLM recommends Standard Seed Mix 2 for all reclamation activities. Seeding rates are shown for drill seeding rates in the above table, and should be doubled for broadcast application. Seed should be applied anytime between mid-September and mid-March. If an alternate date of seeding is requested, contact the designated Natural Resource Specialist (NRS) prior to seeding for approval. Seed mixture rates are Pure Live Seed (PLS) pounds per acre. Topsoil stockpiles must be seeded immediately as part of Phase I interim reclamation.
43. All seed used must be certified and free of noxious weeds. All seed tags will be submitted to the designated NRS within 14 calendar days from the time the seeding activities have ended. Documentation shall be provided with the seed tags to address the purpose of the seeding activity (i.e., seeding of re-contoured areas) and, if applicable, the name and contact information of the contractor who performed the work, the seeding method (e.g., broadcast, hydro-seeded, drilled), an as-built shape-file of the area seeded, an attached map that clearly identifies all disturbed areas that were seeded, and the date the seed was applied.
44. If, after three growing seasons, the following success criteria are not achieved then the steps will be reassessed in consultation with the BLM WRFO and additional seeding at an appropriate seeding window will occur. Success criteria to achieve:
- c) Vegetation monitoring (method approved by the BLM) reveals vegetation with eighty percent similarity of desired foliar cover, bare ground, and shrub and or forb density in relation to the identified DPC. In the absence of specified DPC data, an agreed

upon reference site or AIM data would serve as the DPC. Vegetative cover values for woodland or shrubland sites are based on the capability of those sites in an herbaceous state.

- d) The resulting plant community must have composition of at least five desirable plant species, and no one species may exceed 70 percent relative cover to ensure that site species diversity is achieved. Desirable species include native species from the surrounding site, species listed in the range/ecological site description, or species from the BLM approved seed mix.
45. The operator will implement an integrated weed management plan according to BLM manual 9015-Integrated Weed Management (BLM 1992) and maintain this treatment through approval of final reclamation of the project. Prior to the season of construction, WPX must submit Pesticide Use Proposals for the use of herbicides appropriate for control/eradication of the known noxious and invasive nonnative species.
46. In accordance with the 1997 White River RMP/ROD, all trees removed in the process of construction shall be purchased from the BLM. Trees should first be used in reclamation efforts and then any excess material made available for firewood or other uses.
- c) First, woody material will be chipped and stockpiled for later use in reclamation. Woods chips can be incorporated into the topsoil layer to add an organic component to the soil to aid in reclamation success.
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The following site-specific mitigation has been developed for construction, drilling and maintenance actions associated with the proposed disturbance features.

54. The operator is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for disturbing or collecting vertebrate or other scientifically-important fossils, collecting large amounts of petrified wood (over 25lbs./day, up to 250lbs./year), or collecting fossils for commercial purposes on public lands.
55. If any paleontological resources are discovered as a result of operations under this authorization, the operator or any of his agents must stop work immediately at that site, immediately contact the BLM Paleontology Coordinator, and make every effort to protect the site from further impacts, including looting, erosion, or other human or natural damage. Work may not resume at that location until approved by the AO. The BLM or designated paleontologist will evaluate the discovery and take action to protect or remove the resource within 10 working days. Within 10 days, the operator will be allowed to continue construction through the site, or will be given the choice of either (a) following the Paleontology Coordinator's instructions for stabilizing the fossil resource in place and avoiding further disturbance to the fossil resource, or (b) following the Paleontology Coordinator's instructions for mitigating impacts to the fossil resource prior to continuing construction through the project area.
56. For the RGU 11-26-198 well pad all disturbance must be kept to the east of a line of 108° 22' 12.5" west to avoid direct impacts to cultural resources.
57. Vegetation clearing associated with pad, pipeline, and access construction should be initiated outside the primary migratory bird nesting season, 15 May to 15 July, to avoid acute disruption of migratory bird reproductive efforts. Based on estimated project schedules, vegetation clearing associated with the 11-26-198 pad should be initiated prior to 15 May 2015.
58. Vehicle use of the reclaimed cross-country pipeline corridor (i.e., T1S R98W section 23 SESE and section 24 SWSW) should be minimized to the extent practicable or control initiated to avoid the development of a well-established two-track and as a means to deter a pattern of unregulated use by the public and an unauthorized route of convenience by the operator.

COMPLIANCE WITH LAWS & CONFORMANCE WITH THE LAND USE PLAN: This decision is in compliance with the Endangered Species Act and the National Historic Preservation Act. It is also in conformance with the 1997 White River Record of Decision/Approved Resource Management Plan.

PUBLIC INVOLVEMENT: Internal scoping was initiated when the project was presented to the White River Field Office (WRFO) interdisciplinary team on 2/11/2014. External scoping was conducted by posting this project on the WRFO's on-line National Environmental Policy Act (NEPA) register on 2/11/2014.

RATIONALE: The Proposed Action is categorically excluded from further documentation under the National Environmental Policy Act (NEPA) in accordance with Section 390 of the Energy Policy Act. Approval of these two locations and associated wells allows for development of Federal oil and gas minerals.

ADMINISTRATIVE REMEDIES:

State Director Review: Under regulations addressed in 43 CFR 3165.3(b), any adversely affected party that contests a decision of the Authorized Officer may request an administrative review, before the State Director, either with or without oral presentation. Such request, including all supporting documentation, shall be filed in writing with the BLM Colorado State Office at 2850 Youngfield Street, Lakewood, Colorado 80215 within 20 business days of the date such decision was received or considered to have been received. Upon request and showing of good cause, an extension may be granted by the State Director. Such review shall include all factors or circumstances relevant to the particular case.

Appeal: Any party who is adversely affected by the decision of the State Director after State Director review, under 43 CFR 3165.3(b), of a decision may appeal that decision to the Interior Board of Land Appeals pursuant to the regulations set out in 43 CRF Part 4.

SIGNATURE OF AUTHORIZED OFFICIAL:



Field Manager

DATE SIGNED:

08/26/14

